

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

JOCELYNE MOSBY,

Plaintiff,

v.

SAFELITE FULFILLMENT, INC.

d/b/a SAFELITE AUTOGLASS

Defendant.

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C.A. NO. 3:24-cv-03067-K

JURY TRIAL DEMANDED

**DEFENDANT SAFELITE FULFILLMENT, INC.'S UNOPPOSED MOTION
FOR LEAVE TO PROCEED WITHOUT LOCAL COUNSEL**

Pursuant to Local Rule 83.10, Defendant, Safelite Fulfillment, Inc. d/b/a Safelite AutoGlass (“Safelite”), respectfully requests leave from this Court to proceed without local counsel. Undersigned counsel is admitted to practice before the United States District Court for the Northern District of Texas and is familiar with the local rules of this Court. Counsel further understands the obligation to appear in person before the Court as the Court may require.

Local Rule 83.10 provides:

Unless exempted by LR 83.11, local counsel is required in all cases where an attorney appearing in a case does not reside or maintain the attorney’s principal office in this district. “Local counsel” means a member of the bar of this court who resides or maintains the attorney’s principal office in this district and whose residence or principal office is located within 50 miles of the courthouse in the division in which the case is pending. Attorneys desiring to proceed without local counsel must obtain leave from the presiding judge. If the request for leave is denied, written designation of local counsel must be filed within 14 days of the denial.

Undersigned counsel’s office is located in Houston, Texas. Counsel has practiced in both state and federal courts throughout the state of Texas. Counsel for Safelite is fully prepared to

appear personally before this Court for any conference this Court may require. Accordingly, Safelite respectfully requests this Court grant leave to proceed without local counsel.

Plaintiff's counsel is unopposed to this motion.

Respectfully submitted,

VORYS, SATER, SEYMOUR AND PEASE LLP

/s/ Monica A. Fitzgerald

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**ATTORNEY FOR DEFENDANT
SAFELITE FULFILLMENT, INC. D/B/A
SAFELITE AUTOGLASS**

CERTIFICATE OF CONFERENCE

Counsel for Defendant, Monica Fitzgerald, conferred with counsel for Plaintiff, Donald E. Uloth, on December 31, 2024. Mr. Uloth does not oppose this Motion for Leave to Proceed Without Local Counsel.

/s/ Monica A. Fitzgerald

Monica A. Fitzgerald

CERTIFICATE OF SERVICE

I hereby certify that on December 31, 2024, I electronically filed *Defendant Safelite Fulfillment, Inc. d/b/a Safelite AutoGlass's Unopposed Motion for Leave to Proceed Without Local Counsel* with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Donald E. Uloth
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Attorney for Plaintiff

/s/ Monica A. Fitzgerald
Monica A. Fitzgerald